

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf  
of themselves and others similarly situated,

Plaintiffs,

v.

DONALD TRUMP, President of the  
United States, *et al.*,

Defendants.

No. 17-cv-00094 RAJ

**SUPPLEMENTAL DECLARATION OF  
STACY TOLCHIN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
SANCTIONS**

I, Stacy Tolchin, hereby declare:

1. I have personal knowledge of the facts stated below and am competent to testify regarding them.

2. My background and experience as an attorney was set forth in the Declaration of Stacy Tolchin in Support of Plaintiffs' Motion for Class Certification (Dkt. 32) and Declaration of Stacy Tolchin in Support of Plaintiffs' Motion for Sanctions (Dkt. 144).

3. My office engages in contemporaneous time entries for all our cases.

4. I reviewed the time records attributed to the *Wagafe* litigation using our "Clicktime" software. I certify that the time records accurately reflect the time I spent on preparing Plaintiffs' Motion for Sanctions. Attached as **Exhibit A** is a copy of my time records for the work associated with Plaintiffs' Motion for Sanctions.

5. The hourly rate of the work performed is \$676.85 for 2018, based on my year of graduation and the market rates for Seattle, Washington. *See* Declaration of Carol Sobel in Support of Plaintiffs' Motion for Sanctions (Dkt. 138).

6. Below is a chart that details the attorneys' fees that I am seeking for my work on Plaintiffs' Motion for Sanctions. The total value of my work is \$ 3,722.68.

	<b>Time and Rate</b>
Preparing Plaintiffs' Motion for Sanctions	5.5 hours x \$676.85 rate
<b>TOTAL</b>	\$3,722.68

I declare under penalty of perjury that the foregoing is true and correct. Executed in Los Angeles California on March 7, 2019.




---

Stacy Tolchin

Law Offices of Stacy Tolchin  
 634 S. Spring St. Suite 500A  
 Los Angeles, CA 90014  
 Telephone: (213) 622-7450  
 Facsimile: (213) 622-7233  
 Stacy@tolchinimmigration.com

**CERTIFICATE OF SERVICE**

I certify that on the date indicated below, I caused service of the foregoing document via the CM/ECF system, which will automatically send notice of such filing to all counsel of record.

DATED this 13th day of March, 2019, at Seattle, Washington.

s/ Cristina Sepe

Cristina Sepe, WSBA No. 53609

Perkins Coie LLP

1201 Third Avenue, Suite 4900

Seattle, WA 98101-3099

Telephone: 206.359.8000

Facsimile: 206.359.9000

Email: CSepe@perkinscoie.com

# EXHIBIT A

Person	Job	Date	Comment	Hours
Stacy Tolchin				
		3/7/2018	call with team re discovery and sanctions motions	0.70
		3/16/2018	review of motion for oversized draft	0.20
		3/20/2018	sanctions declaration	0.70
		3/21/2018	call re motion for sanctions	0.60
		3/21/2018	review of motion for sanctions	1.10
		3/27/2018	declaration and fees for motion	0.50
		3/27/2018	call re motion for sanctions	0.60
		4/10/2018	review of opp	0.20
		4/10/2018	call re reply on motions for sanctions	0.50
		4/12/2018	review of reply	0.40
				6.20
			<b>Grand Total</b>	<b>5.50</b>